

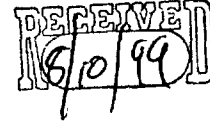
PREMIER DIRECT_{INC.}

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July 27, 1999

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, SW
Washington, D.C. 20204



RE: 21 U.S.C. Section 343(r)(6) Notification of Statements on Dietary Supplements

Dear Sir/Madam:

I hereby notify the Food and Drug Administration ("FDA") of the use of statements of nutritional support in the labeling of Circu-Joint Support 2020, a dietary supplement. Premier Direct, Inc. is a manufacturer of Circu-Joint Support 2020.

Statements Being Made in the Labeling of Circu-Joint Support 2020

- (1) Support healthy blood supply to your joints for optimal flexibility and mobility!
through the body.
- (2) support the health of your joints
- (3) Capsicum - a natural circulatory regulator, promoting healthy blood flow.
- (4) Boswellia - an ancient Indian ayurvedic herb to regulate the blood supply to the joints, which has also been shown to have other important properties.
- (5) Yucca - helps nourish the joints and contains saponins which are catalysts for cortisone production which can be beneficial to joint health
- (6) help support a healthy range of motion and flexibility in your joints.

To the best of my knowledge, and based upon information and belief present at the time of executing this notice, I certify that this information is accurate and complete and Premier Direct, Inc. possesses substantiation that the statements are truthful and not misleading.

A handwritten signature in cursive script, reading "John F. Hurd", followed by the letters "vp" in a simpler font.

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